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April 15, 2023

**VIA ECF**

Hon. Louis L. Stanton  
U.S. District Court for the Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007


**Re: Griffin, et. al. v. Sheeran, et. al. // Case Number 2017-cv-5221 (LLS)**

Dear Judge Stanton:

We represent the Plaintiffs in the above-captioned matter. For the purposes of closing arguments at trial, it is our intention of bifurcating the same—specifically, it is our intention to have Ms. Keisha D. Rice, Esq., proffer a recitation/summary of the evidence, with Mr. Ben Crump, Esq., delivering final remarks at closing. We are requesting permission to bifurcate the closing arguments at the trial of this matter to facilitate that request.

Thank you for your attention to the foregoing.

Respectfully Submitted,

/s/   
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Patrick R. Frank, Esq.  
Counsel(s) for the Plaintiffs